

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED

In re:

Supportive Health LLC,  
  
Debtor.

Case No.: 21-15113-VFP 2022 NOV -4 P 3:13

Chapter 7

Honorable Vincent F. Papalia

Hearing Date

**NOTICE OF CROSS MOTION TO DISMISS IRS PROOF OF CLAIM AND COMPEL  
CITY OF MILWAUKEE TO ACCEPT PAYMENT OF LIEN AND DISMISS PROOF  
OF CLAIM**

**PLEASE TAKE NOTICE** that Carline Bolivar, Principal of Supportive Health LLC and an interested party in Supportive Health LCC bankruptcy, shall move before the Honorable Vincent F. Papalia, on a date and time to be set by the Court, at the United States Bankruptcy Court, District of New Jersey, 50 Walnut Street, Newark, New Jersey, for a motion compelling the production of original signatures pursuant to Fed.R. Bankr. P. 9011.

**PLEASE TAKE FURTHER NOTICE** that Carline Bolivar shall rely upon the Certification submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that any papers in opposition to the Motion must be filed with the Court and served upon Carline Bolivar and Supportive Health LLC.

I declare under penalty of perjury that the forgoing is true and correct.



Carline Bolivar  
Sole-Member, Supportive Health LLC

DATED: October 30, 2022

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FOR THE DISTRICT OF NEW JERSEY**

In re:

Supportive Health LLC,  
  
Debtor.

**Case No.: 21-15113-VFP**

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**CROSS MOTION TO DISMISS IRS PROOF OF CLAIM AND COMPEL CITY OF  
MILWAUKEE TO ACCEPT PAYMENT OF LIEN AND DISMISS PROOF OF CLAIM**

Carline Bolivar, in her capacity as an equity stake hold of the debtor, Supportive Health LLC, and further as principal of Supportive Health LLC, hereby files this cross motion to dismiss the proof of the Internal Revenue Service ("IRS"), Compel the City of Milwaukee to accept payment for its proof of claim and dismiss the City of Milwaukee proof of claim.

1. The Internal Revenue Service filed it proof of claim in the instant matter on July 12, 2021 (see Exhibit A). From the proof of claim, it is clear that the IRS claims are solely based on alleged penalties assessed for not filing the failure of Supportive Health LLC to file its tax returns from 2017 to 2021.

2. As of June 2022, all tax returns due (tax returns from 2017 to Present) were filed with the IRS. The tax returns clearly show that no tax is due from Supportive Health LLC.

3. Further, Supportive Health entered into negotiations with the IRS to eliminate the penalties.

4. Based on the filings that show that no tax is owed to the IRS and the elimination of the penalties for failure to file, I move the court to dismiss the proof of claim filed by the IRS.

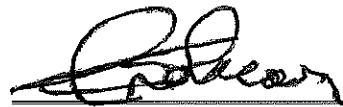
5. As for the City of Milwaukee, many attempts were made by Supportive Health, via its attorney, and personally by Mr. Perrault Jean-Paul to pay off the alleged lien owed. The City of Milwaukee has refused to accept payment and has provided no explanation as to why it does not want to accept payment on its lien.

6. I move the court to compel the City of Milwaukee to accept payment on its lien as it is currently the only alleged lien holder in this bankruptcy matter.

7. With the payment of the City of Milwaukee lien there will be no basis to liquidate the assets of Supportive Health.

WHEREFORE, for the foregoing reasons, Carline Bolivar, respectfully requests that this Court grant her cross motion to dismiss the proof of the Internal Revenue Service ("IRS"), Compel the City of Milwaukee to accept payment for its proof of claim and dismiss the City of Milwaukee proof of claim.

I declare under penalty of perjury that the forgoing is true and correct.



Carline Bolivar  
Sole-Member, Supportive Health LLC

DATED: October 30, 2022

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